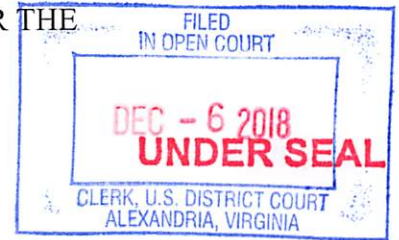


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

ISAAC N. GIBBONS,

Defendant.

)  
) Case No. 1:18-cr-454  
)  
) Count One: 18 U.S.C. §§ 2241(a) and 7(9)  
) (Aggravated Sexual Abuse by Force  
) in the Special Maritime and  
) Territorial Jurisdiction of the United States)  
)  
) Count Two: 18 U.S.C. §§ 2242(1) and 7(9)  
) (Sexual Abuse in the Special Maritime  
) and Territorial Jurisdiction of the  
) United States)  
)  
) Count Three: 18 U.S.C. §§ 2242(b)  
) and 7(9) (Abusive Sexual Contact  
) in the Special Maritime and Territorial  
) Jurisdiction of the United States)

INDICTMENT

December 2018 Term – Alexandria

General Allegations

THE GRAND JURY CHARGES THAT:

1. On or about December 23, 2017, the defendant, ISAAC N. GIBBONS, was employed by the United States Government and assigned to the United States Embassy in the city of Phnom Penh in the country of the Kingdom of Cambodia (“Cambodia”).

2. On or about December 23, 2017, the defendant, ISAAC N. GIBBONS, was living in a residence leased by the United States Embassy in Phnom Penh in connection with the United States' diplomatic mission to Cambodia.

3. The acts described in Counts I and II of this indictment occurred in Phnom Penh, Cambodia, outside the United States, in the residence of the defendant ISAAC N. GIBBONS and within the special maritime and territorial jurisdiction of the United States, Title 18 U.S.C. Section 7(9) ("premises of United States diplomatic, consular, military, or other United States Government missions or entities in foreign States . . . and residence in foreign States . . . used for purposes of those missions or entities or used by United States personnel assigned to those missions or entities").

4. ISAAC N. GIBBONS's last known residence is in Fairfax, Virginia, in the Eastern District of Virginia.

COUNT ONE

*(Aggravated Sexual Abuse by Force in the Special Maritime and Territorial Jurisdiction of the United States)*

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 23, 2017, in the special maritime and territorial jurisdiction of the United States, to wit, property leased by the United States Embassy in Phnom Penh, Cambodia, the defendant, ISAAC GIBBONS, knowingly and unlawfully caused another person, Jane Doe, an adult female, to engage in a sexual act, specifically, contact between ISAAC GIBBONS'S penis and Jane Doe's vulva, by using force against Jane Doe.

(In violation of Title 18, United States Code, Section 2241(a)).

COUNT TWO

*(Sexual Abuse in the Special Maritime and Territorial Jurisdiction of the United States)*

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 23, 2017, in the special maritime and territorial jurisdiction of the United States, to wit, property leased by the United States Embassy in Phnom Penh, Cambodia, the defendant, ISAAC GIBBONS, knowingly and unlawfully caused another person, Jane Doe, an adult female, to engage in a sexual act, specifically, contact between ISAAC GIBBONS'S penis and Jane Doe's vulva, by placing Jane Doe in fear (other than fear of death, serious bodily injury, and kidnapping).

(In violation of Title 18, United States Code, Section 2242(1)).

COUNT THREE

*(Abusive Sexual Contact in the Special Maritime and Territorial Jurisdiction of the United States)*

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 23, 2017, in the special maritime and territorial jurisdiction of the United States, to wit, property leased by the United States Embassy in Phnom Penh, Cambodia, the defendant, ISAAC GIBBONS, knowingly and unlawfully engaged in sexual contact, that is, the intentional touching of the genitalia, groin, and inner thigh of Jane Doe, an adult female, without Jane Doe's permission, with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

(In violation of Title 18, United States Code, Section 2244(b)).

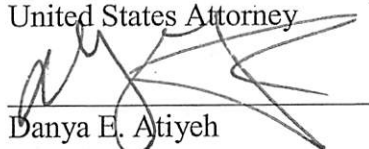
A TRUE BILL

Pursuant to the E-Government Act,,  
The original of this page has been filed  
under seal in the Clerk's Office

Foreperson of the Grand Jury

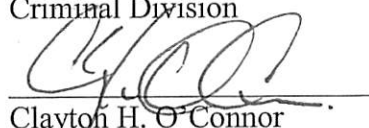
G. Zachary Terwilliger  
United States Attorney

By:

  
Danya E. Attiyeh  
Patricia Haynes  
Assistant United States Attorneys

Brian A. Benczkowski  
Assistant Attorney General  
Criminal Division

By:

  
Clayton H. O'Connor  
Trial Attorney  
Human Rights and Special Prosecutions Section